

FAO: Mr Nigel Parsley  
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E: [REDACTED]

Our ref: [REDACTED]

Your ref:

10 April 2019

Dear Sirs

**Inquest touching on the death of Mr Jeremy Sutch  
Regulation 28: Report to prevent future deaths**

We write on behalf of Vantage Drilling Company ("Vantage") by way of response to the Regulation 28: Report to prevent future deaths (1) dated 22 February 2019 and in particular by way of response to paragraph 7 of same ("Your Response"). You have asked us to provide details of action taken or proposed to be taken and the timetable for action.

**Introduction**

We wish to reiterate, on our own behalf and on behalf of Vantage, our condolences for Jeremy's family's terrible loss.

Since this event, Vantage has reflected upon all of the facts of the incident as identified by various investigations (including the Coroner's own) in order to learn as much as possible. Vantage is always concerned to ensure that its evacuation procedures are fit for purpose, affording those injured the best opportunity to reach expert medical attention in the most timely fashion. It is not possible to foresee and anticipate every possible scenario (hindsight provides improved illumination on the situation) and it is important to recognise that what happened on board the Platinum Explorer was fact specific and highly unusual, being outside the experience of very experienced Mariners.

Since the event involving Mr Sutch, evacuation using wheelchairs have been included in evacuation drills (see below).

As referred to during the Inquest:-

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Your ref:

- I. Vantage arranged for a medic to be on the vessel despite this not being a requirement;
- II. Vantage's MERP involved a recognised international agency as a partner (Vantage were doing things properly);
- III. Vantage are not aware of any advice or industry practice to suggest other operators involved in similar operations, in similar environments, have been taking a different approach;
- IV. Patient extraction from a whole range of occupational settings, even ashore, is often compromised and at least challenging. Speed of response, whilst always desirable, cannot always be achieved or guaranteed because not all factors which impact on speed of response can be controlled. Even ashore, ambulances may be delayed by traffic or weather conditions or simply by demand exceeding supply;
- V. Air ambulances are not a state funded provision in all areas, less still an infinite resource;
- VI. Being aboard a vessel at sea presents a different and additional range of challenges which Vantage sought to address in the MERP they devised;

Vantage is proud of the resourcefulness and the dedication of the crew in dealing with such an unusual scenario and was pleased to have been able to assist the enquiry so openly and fully.

#### Regulation 28 Response

Please find attached:-

- 1) Updated HSE Manual dated 7 March 2019. Please refer in particular to Section 4.25.7 which includes specific reference to the different stretcher types which may be required to be used.
- 2) Emergency Response Drill Matrix. Please see (new) item 26 which is described as "Drill - Medivac Chair Type Stretcher". This requires a drill to be carried out every six months. This spreadsheet also identifies the date on which the next drill will take place, in this case 16 April 2019. Including medivac by way of chair type stretchers in the Drill Matrix ensures that the exercise of utilising the chair type stretcher is scheduled and actioned and any lessons learned are captured. Documenting these drills in our Safety Management Systems ensures compliance is managed and audited.
- 3) Rig Specific Emergency Response Manual dated 11 March 2019 which includes details of the different types of stretcher available on board.

Yours faithfully



Weightmans LLP